

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-80101-CR-MIDDLEBROOKS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DANIEL CRUZ,

Defendant.

_____ /

UNOPPOSED MOTION TO CONTINUE SENTENCING HEARING

Defendant, Daniel Cruz, through undersigned counsel, requests the Court to continue the sentencing in the above-styled cause. As grounds therefore, Defendant states:

1. On September 25, 2024, this Court presided over a Change of Plea hearing and scheduled sentencing for December 12, 2024 (DE 19, 25).

2. At the time of the Change of Plea hearing, Defense Counsel was not aware of when a vital Federal Defender Services Training – Orientation Seminar for New FDO Attorneys¹ would be scheduled.

¹ It is imperative for this Defense Counsel to attend this training. Counsel can separately specify the details of the training and the indispensable need to attend if necessary.

3. After the Change of Plea Hearing, the Federal Defender Services Office Training Division just announced that this training is scheduled for December 9-13, 2024 in San Antonio, Texas.

4. Undersigned counsel has contacted Assistant United States Attorney Daniel Funk, who has no objection to said continuance.

5. Both parties are requesting the sentencing to be rescheduled for the next week (the week of December 16, 2024) if the Court is available.

WHEREFORE, Defendant respectfully requests the Court to grant the above-styled Unopposed Motion to Re-schedule the Sentencing Hearing.

Respectfully submitted,

HECTOR A. DOPICO
INTERIM FEDERAL PUBLIC DEFENDER

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CERTIFICATE OF SERVICE

I HEREBY certify that on October 7, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

By: s/*Renee Sihvola*
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